

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

August 16 2017  
WILLIAM M. McCOOL, Clerk  
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,

v.

LOUIS ONG,  
Defendant.

NO. **CR17-191 RSL**  
INDICTMENT

The Grand Jury charges that:

**COUNT 1**  
**(Laundering of Monetary Instruments)**

On or about February 1, 2017, in King County, in the Western District of Washington, LOUIS ONG, with the intent to conceal and disguise the nature, location, source, ownership, and control, of property believed to be the proceeds of specified unlawful activity, that is, \$50,000 in United States currency, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by a law enforcement officer, to be proceeds of specified unlawful activity, and property used to conduct and facilitate specified unlawful activity, to wit, distribution of controlled substances, in violation of Title 21, United States Code, Section 841(a).

All in violation of Title 18, United States Code, Sections 1956(a)(3)(B) and 2.

**COUNT 2****(Laundering of Monetary Instruments)**

On or about March 1, 2017, in Snohomish County, in the Western District of Washington, LOUIS ONG, with the intent to conceal and disguise the nature, location, source, ownership, and control, of property believed to be the proceeds of specified unlawful activity, that is, \$20,000 in United States currency, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by a law enforcement officer, to be proceeds of specified unlawful activity, and property used to conduct and facilitate specified unlawful activity, to wit, distribution of controlled substances, in violation of Title 21, United States Code, Section 841(a).

All in violation of Title 18, United States Code, Sections 1956(a)(3)(B) and 2.

**COUNT 3****(Laundering of Monetary Instruments)**

On or about June 12, 2017, in Whatcom County, in the Western District of Washington, LOUIS ONG, with the intent to conceal and disguise the nature, location, source, ownership, and control, of property believed to be the proceeds of specified unlawful activity, that is, \$20,000 in United States currency, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce involving property represented by a law enforcement officer, to be proceeds of specified unlawful activity, and property used to conduct and facilitate specified unlawful activity, to wit, distribution of controlled substances, in violation of Title 21, United States Code, Section 841(a).

All in violation of Title 18, United States Code, Sections 1956(a)(3)(B) and 2.

**COUNT 4****(Laundering of Monetary Instruments)**

On or about July 7, 2017, in King County, in the Western District of Washington, LOUIS ONG, with the intent to conceal and disguise the nature, location, source, ownership, and control, of property believed to be the proceeds of specified unlawful

1 activity, that is, \$9,000 in United States currency, did knowingly conduct and attempt to  
 2 conduct a financial transaction affecting interstate and foreign commerce involving  
 3 property represented by a law enforcement officer, to be proceeds of specified unlawful  
 4 activity, and property used to conduct and facilitate specified unlawful activity, to wit,  
 5 distribution of controlled substances, in violation of Title 21, United States Code, Section  
 6 841(a).

7 All in violation of Title 18, United States Code, Sections 1956(a)(3)(B) and 2.

### 8 **COUNT 5**

#### 9 **(Laundering of Monetary Instruments)**

10 On or about July 21, 2017, in King County, in the Western District of Washington,  
 11 LOUIS ONG, with the intent to conceal and disguise the nature, location, source,  
 12 ownership, and control, of property believed to be the proceeds of specified unlawful  
 13 activity, that is, \$200,000 in United States currency, did knowingly conduct and attempt  
 14 to conduct a financial transaction affecting interstate and foreign commerce involving  
 15 property represented by a law enforcement officer, to be proceeds of specified unlawful  
 16 activity, and property used to conduct and facilitate specified unlawful activity, to wit,  
 17 distribution of controlled substances, in violation of Title 21, United States Code, Section  
 18 841(a).

19 All in violation of Title 18, United States Code, Sections 1956(a)(3)(B) and 2.

### 20 **COUNT 6**

#### 21 **(Operating an Unlicensed Money Transmission Business)**

22 Beginning at a time unknown, but not later than December 2016, and continuing  
 23 until on or about July 21, 2017, in King County, within the Western District of  
 24 Washington, and elsewhere, the defendant, LOUIS ONG, knowingly conducted,  
 25 controlled, managed, supervised, directed, and owned all or part of an unlicensed money  
 26 transmitting business affecting interstate and foreign commerce, without an appropriate  
 27 money transmitting license in a State, to wit, the State of Washington, where such  
 28 operation is punishable as a misdemeanor and a gross misdemeanor under State law.

1 All in violation of Title 18, United States Code, Sections 1960(b)(1)(A) and 2.

2 **ASSET FORFEITURE ALLEGATION**

3 The allegations contained in Counts 1-6 of this Indictment are hereby realleged  
4 and incorporated by reference for purpose of alleging forfeitures pursuant to Title 18,  
5 United States Code, Section 982(a)(1).

6 Upon conviction of the violations alleged in Counts 1-6 of this Indictment, the  
7 defendant, LOUIS ONG, shall forfeit to the United States, pursuant to Title 18, United  
8 States Code, Section 982(a)(1), any and all of his right, title and interest in all property,  
9 real or personal, constituting proceeds of or involved in the offenses, or all property  
10 traceable to such property, including but not limited to the following:

11 a. All Bitcoin seized from the Defendant's Mycelium, Green Address,  
12 Co-Pay, and Breadwallet wallets;

13 b. All U.S. currency seized from the Defendant's rental vehicle, *i.e.*, a  
14 white 2017 Ford F-150 Super Crew Cab truck, on or about July 27, 2017;

15 c. All U.S. currency seized from the Defendant's safe deposit box, *i.e.*,  
16 Box #294 located at Wells Fargo in Ferndale, Washington, on or about July 28, 2017; and

17 d. All U.S. currency seized from Express Mail parcel EL513437218US  
18 on or about April 11, 2017.

19 **SUBSTITUTE PROPERTY**

20 If, as a result of any act or omission of the defendant, any of the property subject to  
21 forfeiture, including the above-described property:

22 a. cannot be located upon the exercise of due diligence;

23 b. has been transferred or sold to, or deposited with, a third party;

24 c. has been placed beyond the jurisdiction of the Court;

25 d. has been diminished in value; or,

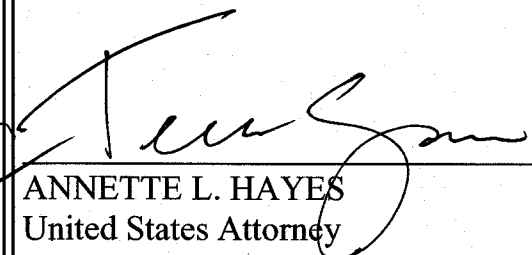
26 e. has been commingled with other property which cannot be divided  
27 without difficulty,  
28

1 it is the intent of the United States to seek forfeiture, pursuant to Title 21, United States  
2 Code, Section 853(p), of any other property belonging to the defendant up to the value of  
3 the forfeitable property.

4 A TRUE BILL:

5 DATED:

6  
7 *(Signature of Foreperson redacted*  
8 *pursuant to the policy of the Judicial*  
9 *Conference of the United States*  
10 FOREPERSON

11   
12 ANNETTE L. HAYES  
United States Attorney

13   
14 KATHERYN FRIERSON  
15 Assistant United States Attorney

16   
17 JOSEPH SILVIO  
18 Special Assistant United States Attorney  
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